

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**MYLAN INC. and
MYLAN PHARMACEUTICALS INC.,**

Plaintiffs,

V.

APOTEX INC. and APOTEX CORPORATION,

Defendants.

Civil Action No. 14-4560 (JAP)(LHG)

Document Electronically Filed

**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR EXPEDITED
DISCOVERY**

THIS MATTER having been brought before the Court by Plaintiffs Mylan Inc. and Mylan Pharmaceuticals Inc. (collectively “Plaintiffs” or “Mylan”), in connection with Mylan’s Motion for Expedited Discovery, pursuant to Federal Rule of Civil Procedure 26(d); and the Court having considered the papers submitted by Mylan in support of its Motion and the papers submitted by Defendants in opposition thereto, if any; and the Court having considered and adopted the Declarations of Wade G. Perrin and Frank G. Smith; and the Court having considered oral argument of the parties, if any; and for the reasons set forth in the record of the proceedings, and for other and good cause having been shown,

IT IS on this day of 2014, hereby:

ORDERED that Plaintiffs' Motion for Expedited Discovery is hereby granted; and it is further

ORDERED that:

1. Plaintiffs may immediately serve on Defendant the requests for production of documents attached as Exhibit F (“Plaintiffs’ Requests”) to the Declaration of Wade G. Perrin filed in support of this Motion. Defendants shall respond to the requests for production of documents within 14 days of the date of service of Plaintiffs’ Requests, in the manner set forth in Federal Rule of Civil Procedure 34 and produce responsive, non-privileged documents within 21 days of service of Plaintiffs’ Requests;

2. Pursuant to Federal Rule of Civil Procedure 30(b)(6), Plaintiffs may immediately serve on Defendants a notice for the deposition of Defendant corporate representative(s) attached as Exhibit G to the Declaration of Wade G. Perrin filed in support of this Motion, such deposition to be conducted within 7 days of Defendants’ production of documents required by paragraph 1 above;

3. Plaintiffs may immediately serve on Genco Pharmaceutical Services, Inc., the subpoena attached as Exhibit H to the Declaration of Wade G. Perrin filed in support of this Motion; and

4. Plaintiffs shall not be precluded from the right to take subsequent discovery in this action.

Dated: _____, 2014
